- REMARKS -

Applicants thank the Examiner for her many courtesies in the interview of April 19, 2005. Although no final agreement was reached, Applicant believes that progress was made.

Claims 6-10, 16-18, and 20 have been cancelled to expedite prosecution, and not to avoid any reference. Applicants maintain their claim to any and all equivalents of these cancelled claims, and preserve their right to present the cancelled claims in a continuation or divisional application. Claims 21-26 have been added without adding new matter, and support for the new claims can be found, *inter alia*, on pages 7-10 of the specification of United States Patent Application 09/738,368.

1. Claims 1-5, 11, 13-15 and 19-20 were rejected under 35 U.S.C. §101.

The 35 U.S.C. §101 rejection of claims 1-5, 11, 13-15 and 19-20 is traversed. In order to be patentable material under §101, a computer related invention needs to have an independent physical act, also called a post-computer process activity. *See* §2106(b)(i) of the MPEP. Claim 1 requires "operating said event master server *to store* said sequence number within said master directory database." (emphasis added) Storing the sequence number within said master directory database is an independent physical act. Thus, claim 1 is drawn to statutory subject matter, as are claims 2-3 depending on claim 1.

Claim 4 requires "operating an event service server *to provide* said event notification to an event client server in response to said replication of said sequence number to said replicate directory database." Providing the event notification is an independent physical act, rendering claim 4 and claim 5 statutory.

Additionally, claim 5 requires "operating said event service server *to provide* said event notification to an event client server in response..." Providing the event notification to an event client server is an independent physical act.

Thus, claims 1-3 are drawn to statutory subject matter, as are claims 4 and 5.

Claim 11 requires a *system* including physical things, such as an event master server, not a method, rendering claims 11 and 13-15 statutory subject matter. While claims 11, 13, and 14 have been cancelled, claim 15 requires a system, not a method, rendering claim 15 statutory subject matter.

Claims 19 and 20 each require a system including physical things such as an event client server and a master directory database, rendering claims 19 and 20 statutory subject matter. Claim 20 has been cancelled, obviating the rejection to claim 20.

Regardless of the above arguments, Applicants have amended claims 1 and 4 to reflect that the method is performed using a computer.

Withdrawal of the §101 rejections to claims 1-5, 11, 13-15 and 19-20 is requested.

2. Claim 20 was rejected under 35 U.S.C. §102(e) as anticipated by Straube

The 35 U.S.C. §102(e) rejection of claim 20 is traversed. Claim 20 has been cancelled, not to avoid Straube, but to expedite prosecution, and to avoid payment of additional claim fees for new claim 21. Withdrawal of the rejection to claim 20 is requested.

3. Claims 1-5, 11, 13-15 and 19 were rejected under 35 U.S.C. §103(a) as unpatentable over Straube in view of Bose

The 35 U.S.C. §103(a) rejection of claims 1-5, 11, 13-15 and 19 is traversed.

In order to maintain this §103(a) rejection, each and every element of the claimed invention must be taught or suggested, in at least as great detail as claimed, by the references, alone or in combination. Because the references do not teach or suggest each and every element, as detailed below, this rejection must fail.

Claims 1-3

Straube in view of Bose does not teach or suggest "operating said event master server to store said sequence number within said master directory database" as claimed in claim 1. Contrary to the assertion of the Examiner, Straube in view of Bose teaches only that the propagator 322 reads the queue and then finds all the children affected by the change and modifies their inherited information. See, *Straube*, column 6, lines 17-21. Straube in view of Bose does not teach or suggest storing the *sequence number* in the master directory database.

Similarly, Straube in view of Bose cannot teach or suggest operating said event server to provide an event message to an event service server, said event message including said sequence number, or operating the master database to replicate said sequence number to a replicate directory database, as claimed in claim 2.

Indeed, Straube unequivocally teaches away from the claimed invention by teaching that "the directory service agent then writes an indication of which object has been changed (basically a database row number or id) into a *propagation queue or list*, which is read by a propagator module 322 which is referred to as a daemon that hangs off the side of the directory database." Straube, column 6, lines 13-17 (emphasis added).

Claims 4-5

Straube in view of Bose does not teach or suggest providing "said event notification to an event client server in response to said replication of said sequence number to said replicate directory database" as claimed in claim 4. At most, Straube in view of Bose teaches replicating a database. See, *Straube* column 5, lines 11-41. The Examiner erroneously relies on Straube for such a teaching, and Bose does not cure the failure of Straube to teach such a claim element.

At most, Straube teaches that "[D]ynamically inherited information in a database is performed by the use of a propagator which finds related objects and recalculates the appropriate information to update." Column 9, lines 40-42. Straube does not address or teach regarding events after the dynamically inherited information is propagated.

Similarly, Bose teaches a system, method, and applications for real-time messaging over HTTP-based protocols. At most, Bose teaches assigning sequence numbers for each EventData item to the message when it arrives at the web server or event mediator and then tracking for each receiver the sequence numbers of messages that have been sent to each receiver and thus determining which messages still need to be sent to each receiver." See, ¶83 of Bose.

Claims 11, 13-15

Claims 11, 13, and 14 have been cancelled to expedite prosecution, and not to avoid any references. Straube in view of Bose does not teach or suggest providing "said event notification to said event client server when said first sequence number is equal to said second sequence number" as claimed in claim 15.

Claim 19

Straube in view of Bose does not teach or suggest an "event client server operable to provide an event notification to at least one directory client when said sequence number is being stored within said replicated directory database" as claimed in claim 19.

At most, Straube teaches that "[D]ynamically inherited information in a database is performed by the use of a propagator which finds related objects and recalculates the appropriate information to update." Column 9, lines 40-42. Straube does not address or teach regarding events after the dynamically inherited information is propagated.

Similarly, Bose teaches a system, method, and applications for real-time messaging over HTTP-based protocols. At most, Bose teaches assigning sequence numbers for each EventData item to the message when it arrives at the web server or event mediator and then tracking for each receiver the sequence numbers of messages that have been sent to each receiver and thus determining which messages still need to be sent to each receiver." See, ¶83 of Bose.

Therefore, Straube in view of Bose does not teach each and every element of the claimed invention, and claims 1-5, 15 and 19 are patentable over the references. Withdrawal of the rejections to claim 1-5, 11, 13-15 and 19 is requested.

4. New Claims

New claims 21-26 are patentable because the prior art, alone or in combination, fails to disclose, teach, or suggest, each and every element of claims 21-26. Support for new claims 21-26 can be found, *inter alia*, on pages 7-10 of the specification of United States Patent Application 09/738,368.

CONCLUSION

The Applicants respectfully submit that claims 1-5, 15, 19, and 21-26 fully satisfy the requirements of 35 U.S.C. §§102, 103 and 112. In view of the foregoing, favorable consideration and early passage to issue of the present application is respectfully requested.

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Respectfully submitted,
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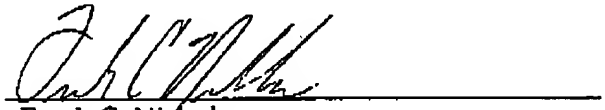

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